

## EXECUTIVE SUMMARY

Southern Graphic Systems manufactures flexographic printing plates and rotogravure printing cylinders. The existing equipment in Florence KY, (021-015-00077) was originally permitted to Gravure Systems with State Origin permit O-82-169. This facility was purchased by Southern Graphic in 2005. Southern Graphic Systems also owns a second facility in Dayton KY, (015-037-00092) that was not required to have a permit, (Registered Source, VOC pte < 100 tpy). With the issuance of this permit, Southern Graphic plans to consolidate operations from both facilities into the Florence location. The combined operation will have the potential-to-emit (pte), of VOC in excess of major source thresholds, however the source has taken limits to avoid the Title V process.

Flexographic plates are made by using solvent based materials to dissolve unwanted portions of the flexographic plate material, leaving the print area as a raised relief. There are (2) two such flexographic plate making processors included in the permit. The Inline processor, has been in existence at the Florence facility. For this processor the source is proposing a change of materials. The second flexographic plate processor and related equipment are being re-located from Dayton. The Dayton processor was originally installed in 2001, following the issuance of a no-permit-required letter on June 4, 2001, (VOC pte 32 tpy).

The rotogravure cylinders are machined, engraved, and hard-chrome plated. Chrome plating is subject to the MACT regulation Subpart N. The facility also has 4 proof presses for testing the rotogravure cylinders. There are (3) existing copper plating tanks at the source. Two tanks each hold 1 cylinder and the third tank holds 2 cylinders. With this permit action the source is removing the one tank which holds 2 cylinders and is replacing this tank with 2 smaller tanks that hold 1 cylinder each. The source is also adding a manual dechrome cleaning station and a second electrolytic dechrome tank.

### **REVISION 1**

Following issuance of the original draft permit, the source requested the option of demonstrating compliance with Subpart N by use of chemical fume suppressants. This option required additional monitoring and recordkeeping requirements to be added to the permit. Current regulations require a public notice / public comment period following a significant revision including a change or addition of recordkeeping and monitoring requirements. Hence the change is being processed as a significant revision even though the final permit has not been issued.

### **PUBLIC, AFFECTED STATE, AND U.S. EPA REVIEW:**

On December 8, 2005, a second public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Florence Boone Co. Recorder*, to cover the requested revision 1. The public comment period expired 30 days from the date of publication.

Comments from the original public notice were received from Paul G. Gaddie, EHS Manager, Southern Graphic Systems on October 19, 2005. Attachment A to this document lists the comments received and the Division's response to each comment. Changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. No additional comments were received for the second public notice, and no comments were received from the EPA or any affected state.